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*Attorneys for Defendants Uber Technologies, Inc.;
 Rasier, LLC; and Berchmann Melancon*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BABYSTACKS CAFÉ, LLC, a Domestic
 Limited Liability Company; REBEL
 KITCHEN INC. dba MANIZZA'S PIZZA, a
 Foreign Limited Liability Company;
 TIMELESS CUISINE, LLC dba ESTHER'S
 KITCHEN, a Domestic Limited Liability
 Company; GAETANO'S HOSPITALITY
 GROUP, LLC dba GAETANO'S
 RISTORANTE, a Domestic Limited Liability
 Company; MUNCH-A-SUB LLC, a Domestic
 Limited Liability Company, and on behalf of
 the Class of similarly situated individuals,

Plaintiffs,

v.

UBER TECHNOLOGIES, INC., a Foreign
 Corporation; RASIER, LLC, a Foreign Limited
 Liability Company; BERCHMANN
 MELANCON, an individual; NICK "DOE", an

CASE NO. 2:24-cv-01098-RFB-MDC

STIPULATION AND PROPOSED ORDER TO EXTEND TIME TO RESPOND TO SECOND AMENDED COMPLAINT

(FIRST REQUEST)

individual; KARINA “DOE”, an individual;
DOE CEO, I through X; DOE SALES
REPRESENTATIVE, I through X; DOE
MANAGER, I through X; DOE DRIVER, I
through X; DOE EMPLOYEE, I through X;
DOES I through X; ROE CORPORATIONS,
XI through XX; and ROE ENTITIES, XI
through XX, inclusive,

Defendants.

Defendants Uber Technologies, Inc., Rasier, LLC and Berchmann Melancon (hereinafter
“**Defendants**”), by and through their counsel of record of the law firm Brownstein Hyatt Farber
Schreck, LLP, and the law firm Jenner & Block LLP; and Plaintiffs Babystacks Café, LLC, Rebel
Kitchen Inc. dba Manizza’s Pizza, Timeless Cuisine, LLC dba Esther’s Kitchen, Gaetano’s
Hospitality Group, LLC dba Gaetano’s Ristorante, and Munch-A-Sub LLC (hereinafter
“**Plaintiffs**”), by and through their counsel of record of the law firm Bighorn Law, hereby stipulate,
contingent on this Court’s approval, as follows:

1. On June 20, 2025, Plaintiffs filed their Second Amended Complaint. ECF 40.
2. The current date for Defendants to respond to the Second Amended Complaint is
July 7, 2025.
2. Pursuant to LR IA 6-1(a), the Parties stipulate and agree that Defendants shall have
an additional 14 days, up to and including July 21, 2025, to respond to the Second Amended
Complaint.
3. There is a strong public policy in the Ninth Circuit of deciding cases on the merits,
rather than technicalities. *See U.S. v. Signed Personal Check No. 730 of Yubran S. Mesle*, 615 F.3d
1085, 1091 (9th Cir. 2010).

4. This is the Parties' first request for an extension of time to respond to the Second Amended Complaint.

DATED this 30th day of June, 2025.

BIGHORN LAW

By: /s/ Kimball Jones
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Attorneys for Plaintiffs

DATED this 30th day of June, 2025.

**BROWNSTEIN HYATT FARBER SCHRECK,
LLP**

By: /s/ Maximilien D. Fetaz
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*Attorneys for Defendants Uber Technologies,
Inc.; Rasier, LLC; and Berchmann Melancon*

IT IS SO ORDERED.



**United States District Court Judge /
United States Magistrate Judge**

Dated: 7-1-25
Case No. 2:24-cv-01098-RFB-MDC